

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:) Chapter 11
)
W.R. GRACE & CO., *et al.*,¹) Case No. 01-01139 (JKF)
) Jointly Administered
)
Debtors.)

**CERTIFICATION OF COUNSEL RE: FILING OF CHART OF DEPOSITIONS AND
OTHER PRIOR TESTIMONY DESIGNATIONS**

1. In conjunction with the Confirmation Hearings that are occurring in these cases, the parties have submitted numerous deposition and other prior testimony designations (the "Designations"). As a result of the Confirmation Hearings having taken place in these cases on September 8-17, 2009, the Court requested that the parties submit a chart of the Designations they still seek to submit as evidence in the confirmation proceedings.

¹ The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co. Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., GC Limited Partners I, Inc., (f/k/a Grace Cocoa Limited Partners I, Inc.), GC Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc., GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W.R. Grace Capital Corporation, W.R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (f/k/a Nestor-BNA, Inc.), MRA Staffing systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-gulch West Coal Company, H-G Coal Company.

2. Attached hereto as Exhibit A is a compilation of charts from the Plan Proponents, Certain Insurers, Continental Casualty Company, Maryland Casualty Company and the Bank Lenders of the Designations which they still seek to have admitted into evidence. These charts contain the following information: (i) the names of the deponents designated, (ii) the lines and pages of the testimony the party seeks to submit into evidence, (iii) a summary of the testimony, (iv) the filed objections, (v) the parties' response to the filed objections, and (vi) the Objectors current position with respect to the Designations.

3. Attached hereto as Exhibit B is a chart of the Libby Claimant' Designations which the Libby Claimants still seek to have admitted into evidence. This chart contains the following information: (i) the name of the deponent, witness or hearing designated, (ii) the lines and pages of the testimony the Libby Claimants seek to submit into evidence, (iii) a summary of the testimony, (iv) a listing of the filed motions, objections and responses relating to those Designations, and (v) the Plan Proponents' current position with respect to the Designations. Since the designations are the subject of numerous pending motions, as outlined in the chart, that will be addressed at the Confirmation hearing on October 13-14, 2009, the chart does not contain a line by line objection to each of the Designations. The Plan Proponents will supplement the chart, as appropriate and necessary, after the Court rules on the various pending motions.

4. The attached do not include or address the Designations of Anderson Memorial Hospital or the State of Montana. These Designations are also the subject of pending motions that will be addressed at the Confirmation hearing on October 13-14, 2009 (see Docket Nos. 22995 and 23260). The Plan Proponents will supplement the chart, as appropriate and

necessary, after the Court rules on various pending motions with respect to Anderson Memorial Hospital and the State of Montana.

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